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Attorneys for Defendants
 BEST & FLANAGAN, LLP and
 DANIEL L. GRIMSRUD

UNITED STATE DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

PACKLANE, INC.,)	Case No.: 23-cv-03496-HSG
)	
Plaintiff,)	Assigned to Hon. Haywood S. Gilliam, Jr.
)	for all proceedings
vs.)	
)	STIPULATION OF THE PARTIES TO
BEST & FLANAGAN, LLP and DANIEL L.)	CONTINUE ADR DEADLINE AND
GRIMSRUD,)	ORDER MODIFYING DOCUMENT
)	NUMBER 36
Defendants.)	

Plaintiff PACKLANE, INC. and Defendants BEST & FLANAGAN, LLP and DANIEL L. GRIMSRUD, by and through counsel, hereby stipulate to the following:


1. By Order dated December 20, 2023, the Court set an ADR deadline for the parties to complete mediation by May 21, 2024, i.e. within 150 days of the date of the Order. *See* Doc. No. 36;
2. The parties have been engaged in written discovery and document productions. To date, they have produced approximately 23,000 pages of documents. Due to the complexity of issues and the large number of documents, however, the parties have not yet completed the first round of discovery. They anticipate completing the first round of discovery by mid-April, 2024;
3. The parties set a mediation date with mediator Stan Roman for May 8, 2024;

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4. Due to the unanticipated delay in completing the initial round of discovery, the parties do not believe there will be sufficient time between the completion of the first round of discovery and the ADR deadline to make mediation fruitful; and
5. Therefore, the parties jointly request that the Court continue the ADR deadline to June 28, 2024 in order to allow the parties time to properly prepare for mediation by evaluating the claims in light of the evidence produced in response to the outstanding discovery so that mediation may be fruitful.


Dated: 4-10-2024

GORDON REES SCULLY MANSUKHANI, LLP

By: 
Dion N. Cominos
Terrence J. Brasch
Attorneys for Defendants
BEST & FLANAGAN, LLP and
DANIEL L. GRIMSRUD

Dated: 4/10/2024

KAGEN, CASPERSEN & BOGART, PLLC

By: 
Stuart Kagen
Joshua Gillette
Attorneys for Plaintiff
PACKLANE, INC.

ORDER

Pursuant to the stipulation of the parties, and for good cause shown, so that the parties may properly prepare for mediation in order to make mediation fruitful, the Court hereby orders that the ADR deadline is continued to June 28, 2024. Document No. 36 is hereby amended to reflect this continued ADR deadline date.

IT IS SO ORDERED.

Dated: 4/11/2024


Hon. Haywood S. Gilliam, Jr.